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September 12, 2014

**VIA EMAIL AND U. S. MAIL**

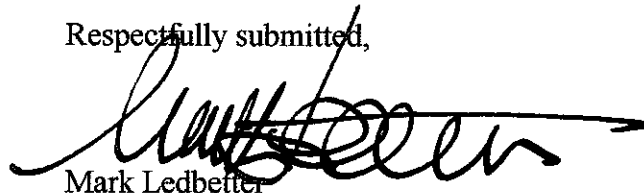
The Honorable Sheryl H. Lipman  
167 N. Main Street  
Memphis, TN 38103

RE: Daniel Lovelace and Helen Lovelace, Individually, and as Parents of  
Brett Lovelace, Deceased v. Pediatric Anesthesiologists, P.A.;  
Babu Rao Paidipalli; and Mark P. Clemons, M.D.  
U.S. District Court, Western District, Western Division, TN;  
Docket No. 2:13cv02289

Dear Judge Lipman:

Please find enclosed Plaintiffs draft Order for your consideration in light of the fact that the Plaintiffs' Motion for Partial Summary Judgment and Brief [D.E. 124] and Plaintiffs' Statement of Undisputed Material Facts [D.E. 125], filed and served upon all counsel on August 8, 2014, were not timely responded to by the Defendant, Clemons.

Respectfully submitted,



Mark Ledbetter

PML/mg  
Enclosure

cc: J. Kimbrough Johnson (w/enc. – via email)  
Marcy Dodds Magee (w/enc. – via email)  
David Cook (w/enc. – via email)  
Brad Gilmer (w/enc. – via email)  
Jerry Potter (w/enc. – via email)  
Karen Koplon (w/enc. – email)